

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No. 23-cv-21377-DPG

**PROPOSED SCHEDULING ORDER SETTING
CIVIL TRIAL DATE AND PRETRIAL SCHEDULE**

THIS CAUSE is set for trial during the Court's two-week trial calendar beginning on **August 26, 2024**. The **Calendar Call** will be held at **9:30 a.m. on Wednesday, August 21, 2024**. A **Status Conference** will be held at **10:00 a.m. on February 12, 2024**. The parties shall adhere to the following schedule:

1. Exchange of initial disclosures by **[06/04/2023]**
2. Joinder of any additional parties and filing of motions to amend the complaint by **[08/25/2023]**
3. Written lists containing the names and addresses of all fact witnesses intended to be called at trial by **[10/06/2023]**
4. Parties shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by **[10/16/2023]**
5. Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2) by **[11/03/2023]**
6. Parties shall select a mediator pursuant to Local Rule 16.2 and shall schedule a time, date, and place for mediation by **[12/18/2023]**

7. Fact discovery shall be completed by [02/14/2024]
[at least five months before Trial date]
8. Expert discovery shall be completed by [03/14/2024]
[at least five months before Trial date]
9. Dispositive motions, including those regarding summary judgment and *Daubert*, shall be filed by [04/12/2024]
[at least four months before Trial date]
10. Mediation shall be completed by [05/24/2024]
[at least three months before Trial date]
11. All pretrial motions and memoranda of law, including motions *in limine*, shall be filed by [06/21/2024]
[at least two months before Trial date]
12. Joint pretrial stipulation, proposed joint jury instructions, proposed joint verdict form, and/or proposed findings of fact and conclusions of law shall be filed by [07/26/2024]
[at least one month before Trial date]
13. Electronic versions of documentary exhibits and Certificates of Compliance re Admitted Evidence shall be filed on CM/ECF by [08/19/2024]
[no later than 48 hours prior to Calendar Call]

Jointly and Respectfully submitted,

/s/ Alejandro Brito

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